

Exhibit C

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

EL CAMPO VENTURES, LLC,	§	
	§	
Plaintiff,	§	
	§	
vs.	§	Civil Action No. 1:20-cv-00560-RP
	§	
STRATTON SECURITIES, INC.,	§	
STRATTON OILFIELD SYSTEMS	§	
TEXAS, LLC, DANIEL STRATTON,	§	
and SHANNON STRATTON,	§	
	§	
	§	
Defendants.	§	

DECLARATION OF PONCHO NEVAREZ

1. My name is Poncho Nevarez. I have personal knowledge of all facts herein, and they are all true and correct. This declaration is submitted in connection with El Campo Ventures, LLC's Supplemental Memorandum in Support of its Motion for Attorney Fees, Prejudgment Interest, Post-judgment Interest and Costs filed in the above-styled-and-numbered lawsuit.

2. I am an attorney duly licensed to practice law in the State of Texas and the State of Arizona and have practiced continuously for 22 years. A large portion of my practice has been devoted to litigation of complex business matters and catastrophic injury cases in state and federal court. I practice law in numerous counties and metropolitan areas in Texas, including in Travis County, Texas, and within the Western District of Texas, Austin Division

(referenced herein together as “Austin”), where this action is pending. I am familiar with prosecuting lawsuits asserting breach of contract claims like those Plaintiff has brought in this case. I am also familiar with the character and the amount of legal work traditionally expended in prosecuting such an action, as well as the fees normally charged. I am further aware of the fees commonly and customarily charged in Austin, for legal services rendered in connection with such litigation.

3. Ben Gates and I represent El Campo Ventures, LLC (“El Campo”), the plaintiff in the above-styled-and-numbered lawsuit.

3. The revised fee agreement with El Campo was set out in writing by letter dated February 24, 2020. Under that agreement, Ben Gates and I, as El Campo’s attorneys, agreed to be compensated solely in the form of a contingent fee. The contingent fee percentage was 25% of the gross sum recovered prior to the commencement of a trial, and 30% of the gross sum recovered after the commencement of a trial. In addition, the fee agreement required El Campo’s attorneys to advance all costs and expenses in this matter. To date, Mr. Gates and I have advanced approximately \$60,000.00 of costs and expenses on behalf of El Campo.

4. I am familiar with the average, customary and reasonable contingent fee percentages charged by attorneys with similar experience and

expertise in Austin. It is my opinion that El Campo's 30% contingent fee is at the bottom end of the range of usual and customary contingent fees charged for similar work in Austin. Contingent fee percentages in Austin (and throughout Texas) for business cases range from 30% to 40% depending on which party pays the expenses, when the case is resolved and the dollar value of the case. It is my opinion that our 30% contingent fee agreement with El Campo in this case is very reasonable considering the approximately \$60,000.00 of costs and expenses that have been advanced by Mr. Gates and myself. Typically, I charge clients a 40% contingency fee when I agree to advance all costs and expenses associated with a matter.

5. In addition, when Stratton Securities, Inc. filed its declaratory judgment action against El Campo (Case No.: 1:20-CV-00248-RP), Mr. Gates and I represented El Campo in that action under the same February 24, 2020 fee agreement.

6. I am also familiar with the average, customary and reasonable hourly rates charged by attorneys with similar experience and expertise in Austin. My standard hourly billing rate is \$500 per hour. My opinion is that \$500 per hour is a very reasonable hourly rate for complex commercial litigation in Austin. When I bill by the hour, I send the client an invoice each month and receive payment within 30 days. Typically, clients deposit an amount of money

in my trust account sufficient to cover any costs or expenses associated with their legal matter.

7. Given the contingent nature of this case, it is my opinion that \$500 per hour would not be a reasonable hourly rate for purposes of calculating a reasonable fee under the lodestar method in this case. Instead, it is my opinion that the loadstar should be calculated at the higher hourly rate of \$750 (1.5x the normal hourly rate) to account for the risk of loss, the delay in receiving any payment for services rendered or recovery of any of the approximately \$60,000.00 in fees and expenses advanced by Mr. Gates and I on behalf of El Campo. I do not undertake any of these risks when I bill my normal reasonable hourly rate of \$500 per hour and therefore these risks justify higher hourly rate in this case.

8. My testimony herein is based on my education, skill, knowledge and experience; my review of my time records; my involvement in this case; and my knowledge of the work performed in this case.

9. In reviewing my time records in this case and in exercising my billing judgment, I would determine what I believed was reasonable given the time expended and the services I provided. In this case, I used my billing judgment to write-down time entries when I believed too much time was expended for a particular task. For purposes of calculating a reasonable attorney's fee using the loadstar method, I spent a total of 379.3 hours and it is

my opinion that this amount of time was reasonably and necessarily expended by me in this case in order to help secure a \$4,095,300.00 jury verdict in favor of El Campo.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on January 5, 2022.

/s/ Poncho Nevarez

Poncho Nevarez

Nevarez Law Group, PC

Billable Hours Report

Case No. 200748	Bill To: El Campo Ventures, LLC
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Date	Timekeeper	Code\Task\ Description	Time Spent (Hrs)	Billable Time (Hrs)	Rate	Billable	Billable Amount
12/13/2019	ANC	A105 Communicate (in firm) Communicate (in firm) meeting w/ Ben Gates re case etc in Eagle Pass	3.0	3.0	\$750.00/Hour		\$2,250.00
12/20/2019	ANC	A106 Communicate (with client) Communicate (with client) spoke with Gattis	0.4	0.4	\$750.00/Hour		\$300.00
12/23/2019	ANC	RR Receipt and Review of Receipt and Review of file up to that point	1.8	1.8	\$750.00/Hour		\$1,350.00
12/30/2019	ANC	A106 Communicate (with client) Communicate (with client) spoke with Rae	0.4	0.4	\$750.00/Hour		\$300.00
02/27/2020	ANC	A105 Communicate (in firm) Communicate (in firm) meeting with Ben re strategy	4.0	4.0	\$750.00/Hour		\$3,000.00
03/09/2020	ANC	RR Receipt and Review of Receipt and Review of Dec Action filed by Defendants; sent Ben some notes	0.8	0.8	\$750.00/Hour		\$600.00
03/11/2020	ANC	RR Receipt and Review of Receipt and Review of news article re lawsuit.	0.1	0.1	\$750.00/Hour		\$75.00
03/11/2020	ANC	RR Receipt and Review of Receipt and Review of email from Dan Gattis re summons	0.1	0.1	\$750.00/Hour		\$75.00
03/12/2020	ANC	A111 Other Conference call with Rae Powell, Dan Gattis, and Ben Gates to discuss litigation strategy	0.5	0.5	\$750.00/Hour		\$375.00
03/16/2020	ANC	A105 Communicate (in firm) Communicate (in firm) Telephone conference with Ben Gates re: petition.	0.3	0.3	\$750.00/Hour		\$225.00
03/16/2020	ANC	L210 Pleadings Pleadings reviewing El Campo Pettion	2.2	2.2	\$750.00/Hour		\$1,650.00
03/17/2020	ANC	L210 Pleadings Pleadings reviewing El Campo Petition phone call with Ben re suggestions and Redline	1.1	1.1	\$750.00/Hour		\$825.00

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Billable Hours Report

Case No. 200748	Bill To: El Campo Ventures, LLC
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Date	Timekeeper	Code\Task\ Description	Time Spent (Hrs)	Billable Time (Hrs)	Rate	Billable	Billable Amount
03/18/2020	ANC	L210 Pleadings Pleadings reviewed El Campo Petition again more redline	0.6	0.6	\$750.00/Hour		\$450.00
03/19/2020	ANC	L210 Pleadings Pleadings worked on El Campo Petition spoke with Ben re redlines	0.6	0.6	\$750.00/Hour		\$450.00
03/20/2020	ANC	L210 Pleadings Pleadings reviewed El Campo Petition with Ben and talked to him about changes	0.6	0.6	\$750.00/Hour		\$450.00
03/23/2020	ANC	L210 Pleadings Pleadings reviewed the El Campo Petition more redline spoke with Ben	0.4	0.4	\$750.00/Hour		\$300.00
03/23/2020	ANC	A106 Communicate (with client) Communicate (with client) to confirm factual allegations in petition and go over one more time	0.4	0.4	\$750.00/Hour		\$300.00
03/24/2020	ANC	L210 Pleadings Pleadings spoke with Ben about petition	0.3	0.3	\$750.00/Hour		\$225.00
03/26/2020	ANC	A103 Draft/revise Reviewed another draft Emailed draft petition to Ben Gates, Dan Gattis and client	0.2	0.2	\$750.00/Hour		\$150.00
03/26/2020	ANC	A105 Communicate (in firm) Communicate/ telephone conference with Ben Gates re: draft of petition	0.1	0.1	\$750.00/Hour		\$75.00
03/26/2020	ANC	A106 Communicate (with client) Communicate (with client) telephone conference re: draft of petition	0.3	0.3	\$750.00/Hour		\$225.00
03/26/2020	ANC	L210 Pleadings Pleadings reviewed and finalized El Campo petition spoke with Ben as well	2.6	2.6	\$750.00/Hour		\$1,950.00
03/30/2020	ANC	RR Receipt and Review of Receipt and Review of petition sent to clients with Exhibits	0.4	0.4	\$750.00/Hour		\$300.00

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Date	Timekeeper	Code\Task\Description	Time Spent (Hrs)	Billable Time (Hrs)	Rate	Billable	Billable Amount
03/30/2020	ANC	A105 Communicate (in firm) Communicate (in firm) with Ben regarding research on some of the legal issues and possible removal	0.6	0.6	\$750.00/Hour		\$450.00
03/31/2020	ANC	A105 Communicate (in firm) Communicate (in firm) with Ben re motion to dismiss	0.4	0.4	\$750.00/Hour		\$300.00
04/01/2020	ANC	A104 Review/analyze Review of draft motion to dismiss; emailed suggested revisions to Ben Gates.	0.8	0.8	\$750.00/Hour		\$600.00
04/15/2020	ANC	RR Receipt and Review of Receipt and Review of notice of removal, motion to transfer venue, response to motion to dismiss, and answer for Stratton Securities and Stratton Oilfield	1.3	1.3	\$750.00/Hour		\$975.00
05/05/2020	ANC	A108 Communicate (other external) Communicate (other external) email with Mike and Ben re scheduling order (s)	0.2	0.2	\$750.00/Hour		\$150.00
05/08/2020	ANC	RR Receipt and Review of Receipt and Review of answer for Daniel Stratton and Shannon Stratton. Notations and questions	0.4	0.4	\$750.00/Hour		\$300.00
05/11/2020	ANC	A104 Review/analyze Review of proposed scheduling order and Def's suggested revisions.	0.3	0.3	\$750.00/Hour		\$225.00
05/13/2020	ANC	A102 Research Research Motion to Remand and review petition and factual bases for remand	3.2	3.2	\$750.00/Hour		\$2,400.00
05/14/2020	ANC	A103 Draft/revise Draft/revise Motion to Remand along with updating case law	7.5	7.5	\$750.00/Hour		\$5,625.00
05/15/2020	ANC	A103 Draft/revise Working on exhibits and drafting El Campo's response to motion to transfer venue.	3.8	3.8	\$750.00/Hour		\$2,850.00

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Date	Timekeeper	Code\Task\Description	Time Spent (Hrs)	Billable Time (Hrs)	Rate	Billable	Billable Amount
05/18/2020	ANC	A104 Review/analyze Reviewed scheduling order entered by Judge Ezra	0.1	0.1	\$750.00/Hour		\$75.00
05/19/2020	ANC	A104 Review/analyze Reviewed and analyzed Stratton's first request for production.	0.5	0.5	\$750.00/Hour		\$375.00
05/22/2020	ANC	A104 Review/analyze Receipt and reviewed of Stratton disclosures, reply to motion to transfer venue and response to motion to remand, made some notes and shared with Ben	0.6	0.6	\$750.00/Hour		\$450.00
05/22/2020	ANC	A104 Review/analyze Reviewed letter from Signor's counsel	0.1	0.1	\$750.00/Hour		\$75.00
06/01/2020	ANC	A108 Communicate (other external) Communicate (other external) re depo dates with counsel	0.1	0.1	\$750.00/Hour		\$75.00
06/02/2020	ANC	RR Receipt and Review of Receipt and Review of email from Mike Jones re: depositions	0.1	0.1	\$750.00/Hour		\$75.00
06/02/2020	ANC	A105 Communicate (in firm) Communicate/Telephone conference with Ben Gates re: depositions	0.4	0.4	\$750.00/Hour		\$300.00
06/02/2020	ANC	A106 Communicate (with client) Communicate (with client) re: request for production. spoke with Ben on this	0.4	0.4	\$750.00/Hour		\$300.00
06/02/2020	ANC	A106 Communicate (with client) Communicate (with client) Re: request for production spoke with Ben on this and made some suggestions on order of production	0.3	0.3	\$750.00/Hour		\$225.00
06/03/2020	ANC	A104 Review/analyze Review and analyze Stratton's request for admissions and ROG's	0.5	0.5	\$750.00/Hour		\$375.00
06/24/2020	ANC	A104 Review/analyze Reviewed letter from Mike Jones re: El Campo document production	0.1	0.1	\$750.00/Hour		\$75.00

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Date	Timekeeper	Code\Task\ Description	Time Spent (Hrs)	Billable Time (Hrs)	Rate	Billable Amount
07/08/2020	ANC	A104 Review/analyze Review/analyze Signor Discovery	1.5	1.5	\$750.00/Hour	\$1,125.00
07/15/2020	ANC	A105 Communicate (in firm) Communicate with Mike Jones re: motion to compel	0.1	0.1	\$750.00/Hour	\$75.00
07/24/2020	ANC	L320 Document Production reviewed El Campo's first request for production to Stratton Defendants.	1.2	1.2	\$750.00/Hour	\$900.00
07/24/2020	ANC	A103 Draft/revise drafted supplemental discovery responses	0.7	0.7	\$750.00/Hour	\$525.00
07/28/2020	ANC	A104 Review/analyze Review letter from Mike Jones re: verification	0.1	0.1	\$750.00/Hour	\$75.00
08/06/2020	ANC	A104 Review/analyze Reviewed and analyze Stratton's second request for production; communication with client re: same	0.4	0.4	\$750.00/Hour	\$300.00
08/07/2020	ANC	A104 Review/analyze Reviewed motion for protective order and had conversation with Ben about it	0.4	0.4	\$750.00/Hour	\$300.00
08/10/2020	ANC	A104 Review/analyze Reviewed 24 documents provided by Dan Gattis and discussed with Ben	0.6	0.6	\$750.00/Hour	\$450.00
08/24/2020	ANC	A104 Review/analyze Reviewed and analyzed Stratton's responses to El Campo's first request for production	0.5	0.5	\$750.00/Hour	\$375.00
08/24/2020	ANC	A104 Review/analyze Review/analyze recordings. 2 El Campo and 7 Stratton recordings. There is a lot there. Spoke with Ben about it.	6.0	6.0	\$750.00/Hour	\$4,500.00
08/24/2020	ANC	A106 Communicate (with client) Communicate (with client) call with Gattis re recordings	0.7	0.7	\$750.00/Hour	\$525.00
08/24/2020	ANC	A106 Communicate (with client) Communicate (with client) with Powell re recordings	0.5	0.5	\$750.00/Hour	\$375.00

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Date	Timekeeper	Code\Task\Description	Time Spent (Hrs)	Billable Time (Hrs)	Rate	Billable Amount
08/28/2020	ANC	A103 Draft/revise reviewed letter to Mike Jones re: Stratton document production	0.1	0.1	\$750.00/Hour	\$75.00
09/02/2020	ANC	RR Receipt and Review of Receipt and Review of audio from the Strattons	4.0	4.0	\$750.00/Hour	\$3,000.00
09/02/2020	ANC	A104 Review/analyze Reviewed and analyzed additional documents produced by Stratton	0.4	0.4	\$750.00/Hour	\$300.00
09/03/2020	ANC	RR Receipt and Review of Receipt and Review of audio from production. It's a lot of stuff there. Spoke with Ben about it.	5.0	5.0	\$750.00/Hour	\$3,750.00
09/08/2020	ANC	A103 Draft/revise Reviewed El Campo's response to Stratton's second request for production	0.4	0.4	\$750.00/Hour	\$300.00
09/09/2020	ANC	L530 Oral Argument Oral Argument initial call with Judge Pittman	0.2	0.2	\$750.00/Hour	\$150.00
09/10/2020	ANC	A104 Review/analyze Reviewed letter from Mike Jones re: missing recordings	0.1	0.1	\$750.00/Hour	\$75.00
09/10/2020	ANC	A103 Draft/revise Reviewed letter to Mike Jones re: Stratton document production	0.1	0.1	\$750.00/Hour	\$75.00
09/23/2020	ANC	RR Receipt and Review of Receipt and Review of dismissal of Signor	0.1	0.1	\$750.00/Hour	\$75.00
09/25/2020	ANC	A103 Draft/revise Reviewed 30(b)(6) notices for Stratton entities	0.2	0.2	\$750.00/Hour	\$150.00
09/26/2020	ANC	L330 Depositions Prepare for Depositions of Strattons	5.0	5.0	\$750.00/Hour	\$3,750.00
09/27/2020	ANC	L330 Depositions Prepare for Depositions of Strattons	2.2	2.2	\$750.00/Hour	\$1,650.00

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Date	Timekeeper	Code\Task\Description	Time Spent (Hrs)	Billable Time (Hrs)	Rate	Billable Amount
09/28/2020	ANC	L120 Analysis/Strategy Analysis/Strategy meet with Ben re depositions	1.7	1.7	\$750.00/Hour	\$1,275.00
09/28/2020	ANC	L330 Depositions Travel from Eagle Pass to Savannah, Georgia for Stratton depositions.	10.0	10.0	\$750.00/Hour	\$7,500.00
09/29/2020	ANC	L330 Depositions Prepare for Depositions meet with Ben prior to	0.5	0.5	\$750.00/Hour	\$375.00
09/29/2020	ANC	L330 Depositions Attended depositions of Shannon Stratton and Daniel Stratton	6.0	6.0	\$750.00/Hour	\$4,500.00
09/29/2020	ANC	A103 Draft/revise Review Draft proposed order re: extension of scheduling order deadlines	0.1	0.1	\$750.00/Hour	\$75.00
09/30/2020	ANC	L330 Depositions Depositions travel from Savannah to Eagle Pass	10.0	10.0	\$750.00/Hour	\$7,500.00
10/08/2020	ANC	A102 Research Spoke with Ben re potential audio experts	0.4	0.4	\$750.00/Hour	\$300.00
10/13/2020	ANC	A104 Review/analyze Reviewed enhanced audio clips of April 30, 2019 recording spoke with Ben about what they mean for the case	2.8	2.8	\$750.00/Hour	\$2,100.00
10/13/2020	ANC	A103 Draft/revise Reviewed letter to Mike Jones re: outstanding discovery issues	0.1	0.1	\$750.00/Hour	\$75.00
10/14/2020	ANC	A104 Review/analyze Reviewed further audio enhancement of the end of the April 30, 2019 recording and spoke to Ben about it	1.6	1.6	\$750.00/Hour	\$1,200.00
10/14/2020	ANC	L120 Analysis/Strategy Spoke to Ben about this and the criminal ramifications of bank deception if any Analyzed file for additional causes of action	0.7	0.7	\$750.00/Hour	\$525.00

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Date	Timekeeper	Code\Task\Description	Time Spent (Hrs)	Billable Time (Hrs)	Rate	Billable Amount
10/15/2020	ANC	L210 Pleadings Pleadings reviewed El Campo First Amend Complaint	1.0	1.0	\$750.00/Hour	\$750.00
10/16/2020	ANC	A104 Review/analyze Review/analyze Amended Complaint	0.6	0.6	\$750.00/Hour	\$450.00
10/19/2020	ANC	A104 Review/analyze Reviewed expert report from Ryan Anderson spoke with Ben about it	0.5	0.5	\$750.00/Hour	\$375.00
10/20/2020	ANC	A104 Review/analyze Reviewed letter from Mike Jones and analyzed additional document production labeled Stratton 650-Stratton 875	0.4	0.4	\$750.00/Hour	\$300.00
10/22/2020	ANC	A103 Draft/revise Reviewed objection to magistrate judge report re: motion to dismiss declaratory judgment action and researched what it means for other causes of action going forward	0.5	0.5	\$750.00/Hour	\$375.00
10/23/2020	ANC	A104 Review/analyze Reviewed and analyzed Stratton 876 - Stratton 1199	0.5	0.5	\$750.00/Hour	\$375.00
10/23/2020	ANC	A104 Review/analyze Review/analyze obj to magistrate recommendation	0.1	0.1	\$750.00/Hour	\$75.00
10/27/2020	ANC	A104 Review/analyze Reviewed and analyzed Stratton 1200 - Stratton 1231	0.4	0.4	\$750.00/Hour	\$300.00
10/29/2020	ANC	A104 Review/analyze Review/analyze Stratton Depos,	1.8	1.8	\$750.00/Hour	\$1,350.00
10/29/2020	ANC	A104 Review/analyze Reviewed and analyzed Stratton 1232 - Stratton 1261	0.4	0.4	\$750.00/Hour	\$300.00
10/29/2020	ANC	A103 Draft/revise Drafted email to Mike Jones re: outstanding discovery issues	0.1	0.1	\$750.00/Hour	\$75.00

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Date	Timekeeper	Code\Task\Description	Time Spent (Hrs)	Billable Time (Hrs)	Rate	Billable	Billable Amount
11/02/2020	ANC	A104 Review/analyze Reviewed and analyzed email from Mike Jones re: outstanding discovery issues	0.1	0.1	\$750.00/Hour		\$75.00
11/02/2020	ANC	RR Receipt and Review of Receipt and review of email from Mike Jones re: additional depositions	0.1	0.1	\$750.00/Hour		\$75.00
11/03/2020	ANC	A104 Review/analyze Reviewed Stratton's response to objection, affidavit of Daniel Stratton, Rae Powell deposition excerpts, and Dan Gattis deposition excerpts	1.5	1.5	\$750.00/Hour		\$1,125.00
11/04/2020	ANC	A104 Review/analyze Reviewed and analyzed Stratton 1262 - Stratton 1486	0.7	0.7	\$750.00/Hour		\$525.00
11/09/2020	ANC	A102 Research Researched and made recommendations/spoke to Ben about potential accounting experts	0.7	0.7	\$750.00/Hour		\$525.00
11/17/2020	ANC	A105 Communicate (in firm) Communicate (in firm) Spoke with Ben re Don Southerland, provided documents for review	1.3	1.3	\$750.00/Hour		\$975.00
11/30/2020	ANC	A104 Review/analyze Reviewed Don Southerland's report and made myself some notes on how this will help the jury	0.8	0.8	\$750.00/Hour		\$600.00
11/30/2020	ANC	A101 Plan and prepare for Reviewed and helped Prepare expert disclosures	0.5	0.5	\$750.00/Hour		\$375.00
12/01/2020	ANC	A105 Communicate (in firm) Conference call with Rae Powell, Dan Gattis and Ben Gates to discuss strategy	0.5	0.5	\$750.00/Hour		\$375.00
12/02/2020	ANC	A104 Review/analyze Reviewed and analyzed Stratton 1487 - Stratton 1493	0.4	0.4	\$750.00/Hour		\$300.00
12/10/2020	ANC	A101 Plan and prepare for Prepare for depositions of Jeff Stratton and Rileigh Knight	6.2	6.2	\$750.00/Hour		\$4,650.00

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Date	Timekeeper	Code\Task\Description	Time Spent (Hrs)	Billable Time (Hrs)	Rate	Billable Amount
12/11/2020	ANC	A101 Plan and prepare for Prepare for deposition of Jeff Stratton	0.7	0.7	\$750.00/Hour	\$525.00
12/11/2020	ANC	L330 Depositions Attended deposition of Jeff Stratton	1.7	1.7	\$750.00/Hour	\$1,275.00
12/11/2020	ANC	L330 Depositions Attended deposition of Rileigh Knight	1.1	1.1	\$750.00/Hour	\$825.00
12/21/2020	ANC	A104 Review/analyze Reviewed documents produced by Justin Hollis made notes	0.4	0.4	\$750.00/Hour	\$300.00
12/21/2020	ANC	A101 Plan and prepare for Prepare for deposition of Justin Hollis	1.7	1.7	\$750.00/Hour	\$1,275.00
12/22/2020	ANC	L330 Depositions Attended deposition of Justin Hollis	0.9	0.9	\$750.00/Hour	\$675.00
12/23/2020	ANC	A103 Draft/revise Review answer to amended complaint in declaratory judgment action	1.3	1.3	\$750.00/Hour	\$975.00
12/28/2020	ANC	L210 Pleadings Pleadings review answer on Dec	0.5	0.5	\$750.00/Hour	\$375.00
12/29/2020	ANC	A104 Review/analyze Review and analyze motion to exclude expert testimony and speak to Ben about it	0.8	0.8	\$750.00/Hour	\$600.00
12/30/2020	ANC	A103 Draft/revise Reviewed El Campo's second request for production to Stratton defendants	0.4	0.4	\$750.00/Hour	\$300.00
01/04/2021	ANC	A101 Plan and prepare for Plan and prepare for hearing on Motion to Remand	1.2	1.2	\$750.00/Hour	\$900.00
01/05/2021	ANC	A111 Other Attended Zoom hearing re: motion to remand	0.5	0.5	\$750.00/Hour	\$375.00
01/05/2021	ANC	A102 Research Legal research and analysis re: grounds for admission of accounting expert testimony spoke with Ben on this	0.7	0.7	\$750.00/Hour	\$525.00

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Date	Timekeeper	Code\Task\ Description	Time Spent (Hrs)	Billable Time (Hrs)	Rate	Billable	Billable Amount
01/06/2021	ANC	A104 Review/analyze Review/analyze response to motion to exclude experts	0.9	0.9	\$750.00/Hour		\$675.00
01/07/2021	ANC	A104 Review/analyze Reviewed and analyzed Stratton 1494 - Stratton 1505	0.4	0.4	\$750.00/Hour		\$300.00
01/08/2021	ANC	L120 Analysis/Strategy Analysis/Strategy and research on the contract and the surrounding supporting/refuting docs	2.0	2.0	\$750.00/Hour		\$1,500.00
01/08/2021	ANC	A104 Review/analyze Review/analyze motion to exclude expert testimony	1.5	1.5	\$750.00/Hour		\$1,125.00
01/12/2021	ANC	A104 Review/analyze Reviewed and analyzed Stratton 1506 - Stratton 1522	0.5	0.5	\$750.00/Hour		\$375.00
01/13/2021	ANC	A104 Review/analyze Reviewed Stratton's response to objection, affidavit of Daniel Reviewed Stratton reply to El Campo's response to motion to exclude expert testimony	0.9	0.9	\$750.00/Hour		\$675.00
01/20/2021	ANC	RR Receipt and Review of Receipt and Review of Gattis and Powell Deposition	1.8	1.8	\$750.00/Hour		\$1,350.00
01/21/2021	ANC	A101 Plan and prepare for Prepare for depositions of Clardy, etc	2.5	2.5	\$750.00/Hour		\$1,875.00
01/22/2021	ANC	A104 Review/analyze Reviewed and analyzed Stratton 1523 - Stratton 1558	0.6	0.6	\$750.00/Hour		\$450.00
01/25/2021	ANC	A101 Plan and prepare for Plan and prepare for motion to exclude hearing	1.0	1.0	\$750.00/Hour		\$750.00
01/25/2021	ANC	A101 Plan and prepare for Plan and prepare for motion to exclude testimony	1.0	1.0	\$750.00/Hour		\$750.00
01/25/2021	ANC	A101 Plan and prepare for Prepared for deposition of Clardy, etc	1.0	1.0	\$750.00/Hour		\$750.00

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Billable Hours Report

Case No. 200748	Bill To: El Campo Ventures, LLC
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Date	Timekeeper	Code\Task\Description	Time Spent (Hrs)	Billable Time (Hrs)	Rate	Billable Amount
01/26/2021	ANC	L330 Depositions Depositions attended Luke Clardy	1.8	1.8	\$750.00/Hour	\$1,350.00
01/26/2021	ANC	A109 Appear for/attend Appear for/attend hearing on motion to exclude	0.5	0.5	\$750.00/Hour	\$375.00
01/26/2021	ANC	A104 Review/analyze Reviewed and analyzed Stratton 1559 - Stratton 1601	0.6	0.6	\$750.00/Hour	\$450.00
01/27/2021	ANC	L250 Other Written Motions Reviewed on El Campo's motion for summary judgment	1.2	1.2	\$750.00/Hour	\$900.00
01/28/2021	ANC	A104 Review/analyze Reviewed and analyzed Stratton's motion for summary judgment including pulling cases	1.8	1.8	\$750.00/Hour	\$1,350.00
01/28/2021	ANC	A104 Review/analyze Review/analyze Stratton MSJ	2.5	2.5	\$750.00/Hour	\$1,875.00
01/29/2021	ANC	A104 Review/analyze Reviewed and analyzed Stratton's responses to El Campo's second request for production; Stratton 1602 - Stratton 1697	0.6	0.6	\$750.00/Hour	\$450.00
01/29/2021	ANC	L250 Other Written Motions Reviewed El Campo's motion for summary judgment	1.2	1.2	\$750.00/Hour	\$900.00
02/10/2021	ANC	L250 Other Written Motions Reviewed El Campo's response to Stratton's motion for summary judgment	1.2	1.2	\$750.00/Hour	\$900.00
02/11/2021	ANC	L250 Other Written Motions Reviewed El Campo's response to Stratton's motion for summary judgment made some more suggestions	1.3	1.3	\$750.00/Hour	\$975.00
02/12/2021	ANC	A104 Review/analyze Reviewed and analyzed Stratton's response to El Campo's motion for summary judgment made some notes	0.7	0.7	\$750.00/Hour	\$525.00

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Billable Hours Report

Case No. 200748	Bill To: El Campo Ventures, LLC
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Date	Timekeeper	Code\Task\Description	Time Spent (Hrs)	Billable Time (Hrs)	Rate	Billable	Billable Amount
02/12/2021	ANC	A104 Review/analyze Reviewed Stratton's stipulation of dismissal of its declaratory judgment action against El Campo	0.2	0.2	\$750.00/Hour		\$150.00
02/18/2021	ANC	A104 Review/analyze Reviewed and analyzed Stratton's reply to El Campo's response to its motion for summary judgment	0.7	0.7	\$750.00/Hour		\$525.00
02/18/2021	ANC	L250 Other Written Motions Worked on El Campo reply to Stratton response to its motion for partial summary judgment	1.4	1.4	\$750.00/Hour		\$1,050.00
02/24/2021	ANC	L250 Other Written Motions Worked on El Campo reply to Stratton response to its motion for partial summary judgment	1.5	1.5	\$750.00/Hour		\$1,125.00
03/02/2021	ANC	L330 Depositions Depositions prep for John Baxter	3.2	3.2	\$750.00/Hour		\$2,400.00
03/03/2021	ANC	A104 Review/analyze Reviewed Sunflower Bank's discovery responses and document production; SB_000001-SB_000884 spoke to Ben about this	0.6	0.6	\$750.00/Hour		\$450.00
03/04/2021	ANC	A109 Appear for/attend Attend deposition of John Baxter	1.5	1.5	\$750.00/Hour		\$1,125.00
03/29/2021	ANC	A111 Other Email correspondence with Mike Jones and Ben Gates re: possible mediation dates	0.1	0.1	\$750.00/Hour		\$75.00
03/30/2021	ANC	A102 Research Researched potential Dallas-based mediators spoke with Ben on this	0.3	0.3	\$750.00/Hour		\$225.00
03/30/2021	ANC	A111 Other Email correspondence with Mike Jones and Ben Gates re: potential mediators	0.1	0.1	\$750.00/Hour		\$75.00
04/02/2021	ANC	A104 Review/analyze Reviewed and analyzed Stratton 1698 - Stratton 1723	0.5	0.5	\$750.00/Hour		\$375.00

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Billable Hours Report

Case No. 200748	Bill To: El Campo Ventures, LLC
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Date	Timekeeper	Code\Task\Description	Time Spent (Hrs)	Billable Time (Hrs)	Rate	Billable Amount
04/12/2021	ANC	A111 Other Email correspondence with Carolina El Azar scheduling mediation with Judge Glen Ashworth on May 25, 2021	0.1	0.1	\$750.00/Hour	\$75.00
04/28/2021	ANC	A111 Other Email correspondence with client re: mediation	0.1	0.1	\$750.00/Hour	\$75.00
05/13/2021	ANC	A104 Review/analyze Reviewed order moving trial date to September 13; communicate with client re: same	0.2	0.2	\$750.00/Hour	\$150.00
05/18/2021	ANC	A101 Plan and prepare for Plan and prepare for mediation. Reviewing packet and exhibits to provide	2.3	2.3	\$750.00/Hour	\$1,725.00
05/19/2021	ANC	A111 Other reviewed changes to confidential mediation statement	0.6	0.6	\$750.00/Hour	\$450.00
05/20/2021	ANC	A107 Communicate (other outside counsel) Telephone conference with Judge Ashworth re: mediation	0.2	0.2	\$750.00/Hour	\$150.00
05/24/2021	ANC	A101 Plan and prepare for Prepare for mediation	1.2	1.2	\$750.00/Hour	\$900.00
05/25/2021	ANC	A109 Appear for/attend Attend mediation	8.0	8.0	\$750.00/Hour	\$6,000.00
06/24/2021	ANC	A104 Review/analyze Review and analyze summary judgment report	1.2	1.2	\$750.00/Hour	\$900.00
07/14/2021	ANC	A111 Other Worked on Notice to Court including but not limited to Limines, Voir Dire, deposition clips witness lists, expert designations catch alls	7.3	7.3	\$750.00/Hour	\$5,475.00
07/15/2021	ANC	A111 Other Work on Notice to Court and coordinate with Ben the issues at bar with Limine and clips and review Ben's portion	8.0	8.0	\$750.00/Hour	\$6,000.00

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Billable Hours Report

Case No. 200748

Bill To: El Campo Ventures, LLC

Date	Timekeeper	Code\Task\ Description	Time Spent (Hrs)	Billable Time (Hrs)	Rate	Billable	Billable Amount
07/16/2021	ANC	A111 Other Work on Notice to Court	2.3	2.3	\$750.00/Hour		\$1,725.00
07/28/2021	ANC	A101 Plan and prepare for Prepare for (help Ben) for Pre Trial hearing	1.5	1.5	\$750.00/Hour		\$1,125.00
08/06/2021	ANC	A101 Plan and prepare for Plan and prepare for direct outlines of Gattis and Powell	5.2	5.2	\$750.00/Hour		\$3,900.00
08/09/2021	ANC	A104 Review/analyze Review/analyze Clardy deposition and Hollis made cuts and notations	3.0	3.0	\$750.00/Hour		\$2,250.00
08/12/2021	ANC	A104 Review/analyze Review/analyze and made some preliminary cuts to banker's depo	2.2	2.2	\$750.00/Hour		\$1,650.00
08/16/2021	ANC	A104 Review/analyze Review/analyze read Strattons' depositions again and made some prelim cuts	4.3	4.3	\$750.00/Hour		\$3,225.00
08/17/2021	ANC	A104 Review/analyze Review/analyze cross of Strattons, depo cuts	4.0	4.0	\$750.00/Hour		\$3,000.00
08/18/2021	ANC	A101 Plan and prepare for Plan and prepare for slides and how to present documents	4.5	4.5	\$750.00/Hour		\$3,375.00
08/20/2021	ANC	A101 Plan and prepare for Plan and prepare further for cross examinations of Strattons	4.0	4.0	\$750.00/Hour		\$3,000.00
08/23/2021	ANC	RR Receipt and Review of Receipt and Review of Knight and Jeff Stratton Depositions	1.6	1.6	\$750.00/Hour		\$1,200.00
08/25/2021	ANC	A101 Plan and prepare for Plan and prepare for trial. Start building folders and preparing jury selection and arguments	8.3	8.3	\$750.00/Hour		\$6,225.00
08/29/2021	ANC	A101 Plan and prepare for Plan and prepare for jury selection	2.8	2.8	\$750.00/Hour		\$2,100.00

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Billable Hours Report

Case No. 200748	Bill To: El Campo Ventures, LLC
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Date	Timekeeper	Code\Task\Description	Time Spent (Hrs)	Billable Time (Hrs)	Rate	Billable	Billable Amount
09/01/2021	ANC	A101 Plan and prepare for Plan and prepare for jury selection including phone calls with Ben	10.0	10.0	\$750.00/Hour		\$7,500.00
09/02/2021	ANC	A111 Other Travel from Eagle Pass to Austin to attend jury selection	4.0	4.0	\$750.00/Hour		\$3,000.00
09/02/2021	ANC	A101 Plan and prepare for Prepare for Voir Dire	4.0	4.0	\$750.00/Hour		\$3,000.00
09/03/2021	ANC	A109 Appear for/attend Appear for/attend travel back from ATX to Eagle Pass	4.0	4.0	\$750.00/Hour		\$3,000.00
09/03/2021	ANC	L450 Trial and Hearing Attendance Trial and Hearing Attendance To Eagle Pass from Austin travel for jury selection	4.0	4.0	\$750.00/Hour		\$3,000.00
09/03/2021	ANC	L440 Other Trial Preparation Attended jury selection	8.0	8.0	\$750.00/Hour		\$6,000.00
09/04/2021	ANC	L440 Other Trial Preparation Other Trial Preparation and Support	12.0	12.0	\$750.00/Hour		\$9,000.00
09/05/2021	ANC	L440 Other Trial Preparation Other Trial Preparation and Support	9.0	9.0	\$750.00/Hour		\$6,750.00
09/06/2021	ANC	A111 Other Other travel from Eagle Pass to ATX for Trial	4.0	4.0	\$750.00/Hour		\$3,000.00
09/06/2021	ANC	L450 Trial and Hearing Attendance Trial and Hearing Attendance travel to Austin from Eagle Pass for trial	4.0	4.0	\$750.00/Hour		\$3,000.00
09/06/2021	ANC	L440 Other Trial Preparation Other Trial Preparation and Support	11.0	11.0	\$750.00/Hour		\$8,250.00
09/07/2021	ANC	L440 Other Trial Preparation Other Trial Preparation and Support	5.0	5.0	\$750.00/Hour		\$3,750.00
09/07/2021	ANC	L450 Trial and Hearing Attendance Trial	8.0	8.0	\$750.00/Hour		\$6,000.00
09/07/2021	ANC	L440 Other Trial Preparation Other Trial Preparation and Support	5.0	5.0	\$750.00/Hour		\$3,750.00

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Billable Hours Report

Case No. 200748	Bill To: El Campo Ventures, LLC
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Date	Timekeeper	Code\Task\Description	Time Spent (Hrs)	Billable Time (Hrs)	Rate	Billable Amount
09/08/2021	ANC	L440 Other Trial Preparation Other Trial Preparation and Support	4.0	4.0	\$750.00/Hour	\$3,000.00
09/08/2021	ANC	L450 Trial and Hearing Attendance Trial	8.0	8.0	\$750.00/Hour	\$6,000.00
09/08/2021	ANC	L440 Other Trial Preparation Other Trial Preparation and Support	4.0	4.0	\$750.00/Hour	\$3,000.00
09/09/2021	ANC	L440 Other Trial Preparation Other Trial Preparation and Support	2.0	2.0	\$750.00/Hour	\$1,500.00
09/09/2021	ANC	L450 Trial and Hearing Attendance Trial	6.0	6.0	\$750.00/Hour	\$4,500.00
09/09/2021	ANC	A111 Other Travel to Eagle Pass from Austin	4.0	4.0	\$750.00/Hour	\$3,000.00
12/01/2021	ANC	A104 Review/analyze Review/analyze and prepare for hearing on fees. Review our filing	1.5	1.5	\$750.00/Hour	\$1,125.00
12/03/2021	ANC	L450 Trial and Hearing Attendance Trial and Hearing Attendance including travel back and forth from Eagle Pass to Austin	9.0	9.0	\$750.00/Hour	\$6,750.00

Total Bill To: El Campo Ventures, LLC	379.3	379.3	\$284,475.00
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Total for Case No. 200748	379.3	379.3	\$284,475.00
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